

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE YOUTH MOVEMENT,

Plaintiff,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State,

Defendant.

Case No. 1:24-cv-00291-SE-TSM

JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER

NOW COME all parties, by and through their respective counsel, and jointly request that the Court enter the Proposed Protective Order, attached hereto and made a part hereof, and state as follows:

1. On July 2, 2025, the Court issued an order ruling that “[i]n light of the court’s order in *Coalition for Open Democracy v. Formella*, No. 24-cv-312 (D.N.H.) granting the plaintiffs’ motion to compel and the protective order entered in that case which contemplates disclosure of all Confidential and Highly Confidential Information to the plaintiffs in this case, the motion is denied as moot without prejudice.” End. Order (July 2, 2025).

2. To effectuate compliance with the Court’s Endorsed Order and to preserve the parties’ objections to the Motions to Compel in this lawsuit and in *Open Democracy*, and to reserve their rights with respect to the demand for and the production of the Statewide Voter Registration System and the information maintained therein, the parties jointly ask the Court to enter the attached proposed Protective Order and Schedule A (Exhibit A).

Prayer for Relief

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Grant this Motion;
- B. Enter the attached proposed Protective Order and Schedule A; and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANT DAVID M. SCANLAN, in his official capacity as N.H. Secretary of State

By his attorney,

JOHN M. FORMELLA
NEW HAMPSHIRE ATTORNEY GENERAL

Date: July 16, 2025

/s/ Michael P. DeGrandis
Michael P. DeGrandis, N.H. Bar No. 277332
Assistant Attorney General
Catherine A. Denny, N.H. Bar No. 275344
Assistant Attorney General
Office of the Attorney General, Civil Bureau
1 Granite Place South
Concord, NH 03301
(603) 271-3650
michael.p.degrandis@doj.nh.gov
catherine.a.denny@doj.nh.gov

PLAINTIFF NEW HAMPSHIRE YOUTH MOVEMENT

By its attorneys,

David R. Fox*
ELIAS LAW GROUP LLP
250 Massachusetts Avenue, N.W.
Suite 400
Washington, D.C. 20001
(202) 968-4490
dfox@elias.law

Tyler L. Bishop*
ELIAS LAW GROUP LLC
1700 Seventh Avenue
Suite 2100
Seattle, WA 98101
(206) 656-0177
tbishop@elias.law

/s/ Steven J. Dutton
Steven J. Dutton, N.H. Bar No. 17101
Connor W. Harding, N.H. Bar No. 276438
MCLANE MIDDLETON, P.A.
900 Elm Street
Manchester, NH 03101
(603) 628-1377
steven.dutton@mclane.com
connor.harding@mclane.com

* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis
Michael P. DeGrandis